

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

JORGE MIKEL PITTS, a/k/a “JOSE;”  
ELIJAH BEAU GRADY;  
DOMINICK JUSTIN WELLS;  
FERRIN LEONE WELLS;  
PATRICIA PAULEEN CHRISTINE  
LINCOLN;  
CORY LEE JOHNSON; and  
JUSTIN LLOYD PRICE

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 21 U.S.C. §§ 841(a)(1),  
841(b)(1)(C), and 846; and 18 U.S.C.  
§§ 2 and 924(c)(1)(A)(i)

**COUNT ONE**

**Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone**

The Grand Jury Charges:

Beginning in or about 2016 and continuing until the date of this Indictment, in the District of North Dakota, and elsewhere,

JORGE MIKEL PITTS, a/k/a “JOSE;”  
ELIJAH BEAU GRADY;  
DOMINICK JUSTIN WELLS;  
FERRIN LEONE WELLS;  
PATRICIA PAULEEN CHRISTINE LINCOLN;  
CORY LEE JOHNSON; and  
JUSTIN LLOYD PRICE

knowingly and intentionally combined, conspired, confederated, and agreed together and with others, both known and unknown to the grand jury, to distribute and to possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone,

a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute, and possess with intent to distribute, pills containing a detectable amount of oxycodone, a Schedule II controlled substance, in and about the Fort Berthold Indian Reservation in North Dakota, and elsewhere;
2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities, including by, among other things, concealing pills containing oxycodone and firearms within panels of motor vehicles;
3. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;
4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of controlled substances;
5. It was further a part of said conspiracy that one or more conspirators traveled by rental vehicle, bus, and other means of transportation, between and within Michigan, North Dakota, and elsewhere, to obtain and distribute

pills containing oxycodone, and to transport the proceeds of distribution activity;

6. It was further a part of said conspiracy that one or more conspirators utilized residences located in and near New Town, North Dakota, and elsewhere, to possess, store, conceal, and distribute pills containing oxycodone, and to store and conceal the proceeds of pill distribution activity; and,

7. It was further a part of said conspiracy that one or more conspirators possessed firearms to protect the conspirators' controlled substances and proceeds of distribution from theft, and to intimidate other persons;

In violation of Title 21, United States Code, Section 846; and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

**Distribution of Oxycodone**

The Grand Jury Further Charges:

Beginning in or about 2016 and continuing until the date of this Indictment, in the District of North Dakota, and elsewhere,

JORGE MIKEL PITTS, a/k/a “JOSE;”  
ELIJAH BEAU GRADY;  
DOMINICK JUSTIN WELLS;  
FERRIN LEONE WELLS;  
PATRICIA PAULEEN CHRISTINE LINCOLN;  
CORY LEE JOHNSON; and  
JUSTIN LLOYD PRICE,

individually, and by aiding and abetting, knowingly and intentionally distributed a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and Title 18, United States Code, Section 2.

COUNT THREE

**Possession of Oxycodone with Intent to Distribute**

The Grand Jury Further Charges:

On or about January 25, 2018, in the District of North Dakota, and elsewhere,

JORGE MIKEL PITTS, a/k/a “JOSE,”

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute approximately 1,650 pills containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and Title 18, United States Code, Section 2.

COUNT FOUR

**Possession of a Firearm in Furtherance of a Drug Trafficking Crime**

The Grand Jury Further Charges:

On or about January 25, 2018, in the District of North Dakota,

JORGE MIKEL PITTS, a/k/a “JOSE,”

possessed a firearm in furtherance of a drug trafficking crime for which JORGE MIKEL PITTS may be prosecuted in a court of the United States, specifically; (i) Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone, as alleged in Count One of this Indictment; (ii) Distribution of Oxycodone, as alleged in Count Two of this Indictment; and (iii) Possession with Intent to Distribute Oxycodone, as alleged in Count Three of this Indictment, and the firearm possessed was a Sig Sauer, .40 caliber pistol, Serial Number 55B025390;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

A TRUE BILL:

/s/ Grand Jury Foreperson  
Foreperson

/s/ Christopher C. Myers  
CHRISTOPHER C. MYERS  
United States Attorney

RLV/tmg